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Attorneys for Petitioner
DENISE R. REED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DENISE R. REED,

Petitioner,

vs.

NATIONAL ASSOCIATION OF
SECURITIES DEALERS, INC., WHITE
PACIFIC SECURITIES, INC.
and ROY L. PANELLI,

Respondents.

Case No. 4:07-CV-03648-CW

PETITIONER DENISE R. REED'S
NOTICE OF MOTION AND MOTION
FOR AWARD OF ATTORNEYS' FEES

Hearing Date: January 10, 2008
Hearing Time: 2:00 p.m.
Judge: Hon. Claudia Wilken

Petition Filed: July 16, 2007

TO RESPONDENTS AND THEIR ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m., on January 11, 2008, or as soon thereafter as the matter can be heard, Petitioner DENISE R. REED ("Reed") will and hereby does move this Court for an order granting against Respondent WHITE PACIFIC SECURITIES, INC. ("White Pacific"), Reed's attorneys' fees, costs and expenses incurred in the enforcement of her rights as the Prevailing Party in the arbitration underlying this action, totaling \$42,140.54.

Such an order is authorized and appropriate pursuant to an independent contractor agreement between Reed and White Pacific(the "Agreement") and the award (the "Award") issued in favor of Reed by Respondent FINANCIAL INDUSTRY REGULATORY AUTHORITY ("FINRA", f/k/a

1 National Association of Securities Dealers) in the arbitration.. True and correct copies of the
2 Agreement and the Award are attached as Exhibits "A" and "B", respectively, to the Declaration of
3 Jonah A. Toleno, Esq., filed in support of this motion. FINRA designates Reed as the prevailing
4 party and requires Reed to confirm the Award in court prior to executing the relief specified therein.
5 The Agreement provides that the prevailing party is entitled to attorneys' fees, costs, and expenses
6 incurred in the enforcement of that party's rights as the prevailing party. The pertinent portions of
7 the Award having been confirmed by this Court, Reed is entitled to payment of her attorneys' fees
8 and costs incurred in enforcing her rights.

9 This motion is based on this Notice; the concurrently filed Memorandum of Points and
10 Authorities, Declaration of Jonah A. Toleno, Esq. and exhibits thereto; and on any argument made
11 in support of this motion.

12 DATED: December 5, 2007

Submitted by,

13 SHUSTAK & PARTNERS, P.C.
14 ERWIN J. SHUSTAK
15 THOMAS C. FROST
16 JONAH A. TOLENO

s/Jonah A. Toleno
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